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1900 M STREET, NW, SUITE 800
WASHINGTON, DC 20036-3508
PH: 202.296.6650
FX: 202.296.7585
www.comptel.org



EX PARTE OR LATE FILED

August 19, 1999

Mr. Lawrence E. Strickling
Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED

AUG 19 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: UNE Remand Proceeding
CC Docket No. 96-98

Dear Larry:

On August 18, 1999, I submitted to you a letter summarizing the reasons why unbundled local switching satisfies the standard of Section 251(d)(2) and must be mandated as an unbundled network element ("UNE") available pursuant to Section 251(c)(3) of the Act. CompTel and the member companies supporting that letter strongly urge the Commission to make unbundled switching available nationwide, without restrictions or exceptions, in order to promote the robust local competition envisioned by the 1996 Act. CompTel is aware that many of the ILECs are seeking to "chip away" at local switching by denying it for certain customers or in certain (generally large) geographic areas. This letter addresses those ILEC proposals.

In a joint *ex parte* presentation submitted last month, the Bell Operating Companies and GTE proposed to deny unbundled local switching in (1) special access pricing Zones 1 and 2 and (2) in any rate exchange area served by at least one CLEC switch.¹ These limitations are contrary to the Act and would undermine the spread of competition to all areas of the country. Indeed, the proposed limitations are inconsistent with the five *Pro-Competitive Principles for UNE Entry* described in CompTel's August 10 *ex parte* letter.² Whether another CLEC is using a local switch has no bearing on the alternatives available to a different requesting carrier seeking to enter the market. Because requesting carriers may be of any size, serve diverse customer bases, and pursue a variety of business plans, the Commission cannot assume that a

¹ Joint *Ex Parte* Presentation of Ameritech, Bell Atlantic, BellSouth, GTE, SBC, and U S West, dated July 1999 ("RBOC/GTE *ex parte*").

² Letter from Carol Ann Bischoff, CompTel, to Larry Strickling, FCC, August 10, 1999 ("CompTel August 10 *ex parte*").

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path chosen by one carrier can be replicated by another carrier. Therefore, the Commission cannot allow one carrier's switch deployment to limit the options of another.³

The primary problem with the ILECs' proposed limitation is that it bears no rational connection to the impairment analysis mandated by Section 251(d)(2). As CompTel has explained in its Comments and elsewhere in this docket, the Commission cannot find a lack of impairment unless external elements are interchangeable with the ILEC's element and adequate wholesale supply is available. Although the Commission may adopt a reasonable, empirically-based proxy for the impairment analysis, any such proxy, to be valid, must address *both* the interchangeability of the element and the degree of wholesale alternatives.

In the context of switching, the first element—interchangeability—requires evidence that the process of connecting a customer to a CLEC switch is not materially different from that required to connect the customer to the ILEC's switch. To begin to address this question, one must look to “provisioning qualities” of the local switch—i.e., how simple and costly is it to use the local switch to provide services to end-user customers. Such a perspective focuses on the “line side” (i.e., customer side) interfaces of the local switch.⁴ For instance, where entrants desire to terminate individual circuits, manual provisioning systems impose excessive costs that effectively preclude the important prerequisite of interchangeability from being satisfied. Stated another way, the costs and delays associated with serving lower capacity customers through an external switch are materially higher than serving that customer using the ILEC's local switching capabilities.⁵

On the other hand, where carriers seek higher capacity end-user interfaces, the non-recurring costs to establish a serving arrangement become a smaller percentage of the overall cost. As a result, these costs tend to impact both externally and internally supplied network elements in similar ways. For example, it appears that the most significant use of self-supplied switches involves provisioning service to customers at a DS-1 interface or higher.⁶ The DS-1 interface, therefore, might serve as a useful rough proxy for interchangeability in most instances.

³ See CompTel August 10 *ex parte*, at 3-4.

⁴ Although by no means should line side interfaces be the *sole* factor weighing in an impairment analysis, these interfaces provide a closer nexus to the feasibility of alternatives to ILEC switching than any of the criteria suggested by the ILECs.

⁵ The chart attached as Exhibit 1 hereto demonstrates the enormous costs imposed to manually rearrange individual lines (loops) to externally provided local switching ports.

⁶ By “DS-1 and higher” interfaces, CompTel refers to line side interfaces that provide 24 usable end user channels for voice grade service. The Commission should make clear, however, that this restriction does *not* apply to ISDN-Primary Rate Interface (PRI) arrangements. CLECs have been extensively using PRI arrangements, which provide higher capacity but dedicate one channel for signaling purposes, as a means to improve service available to multi-line customers. This type of innovation is precisely the kind envisioned by the Act and should not be undermined by any proxies considered in this proceeding.

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Critically, the reasonableness of a DS-1 based proxy for interchangeability is predicated upon the existence of certain prerequisites that must be in place so that entrants can efficiently aggregate DS-1 (and above) customer requirements:

- * Combinations of loop, multiplexing and dedicated transport (i.e., "extended loop" arrangements) need to be provided ubiquitously without restriction, and at all transmission speeds, including DS-1 or higher. Extended loops must be available consistent with CompTel's five *Pro-Competitive Principles for UNE Entry*, i.e., without class of service, customer or use restrictions on their availability. CompTel's discussion herein is predicated on a carrier's ability to aggregate all types of customer traffic to a central point using extended loop arrangements.
- * ILECs must have fully implemented the Commission's collocation requirements pursuant to approved state tariffs complying with the *Cageless Collocation Order* in Docket 98-147. In addition, collocation should not be required for CLECs to obtain access to extended loops.
- * ILEC procedures to provide "hot-cuts" of DS-1 interface arrangements must be developed and tested for nondiscrimination (when compared to ILEC DS-1 provisioning actions).

Assuming that these prerequisites are met, the first half of the Commission's analysis -- interchangeability -- could roughly correlate to the type of line side interface used. However, such a proxy does not adequately address the second factor -- wholesale alternatives. In CompTel's view, a DS-1 proxy can reasonably be used only when combined with a geographic limitation that approximates the areas in which DS-1 interfaces might reasonably be expected to become available in a commercially practical way. Although CompTel does not agree that wholesale switching alternatives have developed *anywhere* today, the most likely candidates for such alternatives are in the highest density pockets of the largest Metropolitan Statistical Areas ("MSAs"). Thus, as discussed below, any proxy-based approach should be applied only to end offices in certain MSAs that *also* meet further criteria.

With respect to determining the geographic application of any potential limitation on the availability of unbundled local switching, two potential approaches have been identified. The first relies on the *preexisting* Zones used for special access pricing;⁷ the second would use MSAs above a certain size.⁸ Neither standard, however, is a suitable proxy for the availability of switching alternatives at a DS-1 or higher level.

⁷ See RBOC/GTE *ex parte* (proposing Zones 1 and 2). Because of the nearly boundless latitude the ILECs enjoy to manipulate these Zones for strategic pricing purposes, only those Zone 1 offices as they existed on January 1, 1999 should even be candidate areas to apply a UNE limitation.

⁸ Letter from Chuck Goldfarb, MCI WorldCom, to Larry Strickling, FCC, August 9, 1999 ("MCI WorldCom *ex parte*").

The MSA proposal is not suitable for two reasons. First, the MSA encompasses too large of an area, and therefore fails to predict in any reliable manner whether a requesting carrier will have an alternative means of serving a DS-1 and above customer. For example, the Atlanta MSA (ninth largest in terms of business lines), includes not only high-density counties such as Fulton and Dekalb counties, but also counties such as Pickens where there are only a few COs with low line counts.⁹ Even within a particular county in an MSA, the number of lines per CO can vary significantly.¹⁰ In the five MSAs studied by CompTel, one-third of the total business lines in the MSA were concentrated in only ten percent of the central offices. As a result, the MSA, by itself, encompasses areas too diverse for the analysis required under Section 251(d)(2).

Second, restricting the availability of DS-1 switch interfaces to the largest 30 MSAs (as proposed by MCI WorldCom) would irreparably harm the ability of many of CompTel's members to compete. The MCI WorldCom analysis begins with the assumption that a reasonable CLEC business plan would presume a 10 percent market share.¹¹ In fact, however, few entrants can reasonably expect a 10 percent share. The evidence to date shows that it may take years for the *entire* CLEC industry to achieve such scale.¹² In CompTel's experience, it is far more reasonable for a CLEC business plan to project a 1% to 2% market share over a multi-year horizon. This would greatly lower the number of MSAs in which a CLEC could reasonably expect its market share would justify entry through self-provisioning.

With respect to the Zone approach, special access Zone 1 is not any more likely to correlate with wholesale alternatives for a requesting carrier. As MCI WorldCom's *ex parte* of August 9, 1999 documents, the two primary problems with the Zone 1 approach are (a) the ILECs have considerable discretion to change Zone 1 offices,¹³ and (b) the ILECs have used this discretion in the past to designate many offices in small markets as Zone 1.¹⁴ As a result, Zone 1

⁹ CompTel's August 13, 1999 *ex parte* notice, which provides data on access line distribution within five MSAs, is attached as Exhibit 2.

¹⁰ For example, Dekalb County, Georgia has 4 COs with greater than 30,000 business access lines, but also has 6 COs with fewer than 7,500 lines.

¹¹ More specifically, MCI WoldCom assumed that *no* CLEC business plan would expect to achieve a *greater* than 10 percent market share (MCI WorldCom *ex parte* at 4). Stated in this way, the assumption is true; the analysis, however, evaluates the number of MSAs that an entrant could serve assuming that it *achieved* a 10 percent market share.

¹² The evidence indicates that the *maximum* market share of all CLECs within the top 6 MSAs (those with over 1 million estimated business lines) is less than three percent. See Exhibit 3. Market shares for MSAs 7 through 30 likely are even lower.

¹³ As noted, this deficiency could be addressed in part by limiting any UNE-exception to Zone 1 offices as they existed as of 1/1/99.

¹⁴ MCI WorldCom *ex parte* at 5-7.

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includes many areas where requesting carriers would have no meaningful opportunity to compete if unbundled switching at the DS-1 and above level were restricted.

In CompTel's view, the weaknesses of each approach are minimized, however, if special access Zone 1 is used as a limiting factor within the highest density MSAs. Thus, if the Commission were to restrict unbundled switching at DS-1 and above, it should both limit the number of MSAs to which this rule would apply *and* the central offices within the MSA for which switching would not be available. For example, an approach which limits switching to Zone 1 central offices (as they existed on January 1, 1999) within the 20 largest MSAs would better reflect the areas in which requesting carriers likely could compete using DS-1 and above switching without experiencing material impairment. However, ILECs would still be required to provide unbundled switching for customer interfaces at the DS-1 level and above in all Zone 2 and 3 central offices within the top 20 MSAs and in all MSAs outside the top 20, and unbundled switching for all customer interfaces below the DS-1 level nationwide.

CompTel would welcome an opportunity to discuss this matter further at any convenient time. If you have any questions, please feel free to contact me.

Sincerely,



Carol Ann Bischoff
Executive Vice President
& General Counsel

Enclosures

cc: Magalie R. Salas (2 copies for file)
Attached service list

EXHIBIT 1

CompTel
CC Docket 96-98

The Importance of Interchangeability

State	Electronic Migration¹	Standard Manual Loop/Port Migration²	Coordinated Surcharge
Florida	\$1.46	\$178.00	
Georgia	\$2.01 ³	\$59.91	\$53.16
New York	\$3.82	\$67.18	
Illinois		\$107.63	TBN ⁴
Kansas		\$143.15	\$72.50 ⁵
Iowa		\$123.45	\$105.31
Montana		\$218.62	\$232.92

¹ Electronic migration processes can be designed to satisfy Rule § 51.319(c)(ii):

An incumbent LEC shall transfer a customer's local service to a competing carrier within a time period no greater than the interval within which the incumbent LEC currently transfers end-users between interexchange carriers, if such transfer requires only a change in the incumbent LEC's software.

² Does not include additional costs associated with collocation.

³ BellSouth proposed rate.

⁴ Ameritech has indicated that once a mutually agreed upon "Hot Cut Provisioning Process" is established, rates, terms and conditions will be negotiated.

⁵ Final rates to be determined in cost proceeding.

EXHIBIT 2

KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS

1200 19TH STREET, N.W.

SUITE 500

FACSIMILE

NEW YORK, N.Y.

LOS ANGELES, CA.

(202) 955-9792

MIAMI, FL.

CHICAGO, IL.

STAMFORD, CT.

PARSIPPANY, N.J.

BRUSSELS, BELGIUM

HONG KONG

AFFILIATED OFFICES
NEW DELHI, INDIA
TOKYO, JAPAN

(202) 955-9600

August 13, 1999

ROBERT J. AAMOTH

DIRECT LINE (202) 955-9676

E-MAIL: raamoth@kellydrye.com

VIA COURIER

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

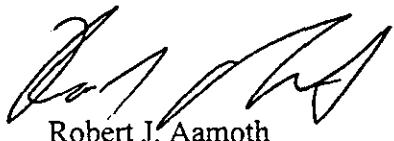
*Re: Ex Parte Presentation in the UNE Remand
Proceeding, CC Docket No. 96-98*

Dear Ms. Salas:

The Competitive Telecommunications Association ("CompTel") held a meeting with Jake Jennings and Chris Libertelli of the Common Carrier Bureau on August 12, 1999. CompTel was represented by Carol Ann Bischoff, Terry Monroe, and the undersigned attorney. In that meeting, CompTel presented information to the Commission regarding access lines in five different Metropolitan Statistical Areas ("MSAs"). A corrected version of those materials is attached for inclusion in the record in this proceeding. CompTel noted limitations on MSAs as a basis for determining the usefulness and feasibility of self-provided switching by competitive local exchange carriers. In addition, the parties discussed materials otherwise submitted on the record regarding the process, timetable and usefulness of installing a switch.

An original and one copy of this notice is provided.

Sincerely,



Robert J. Aamoth

Enclosures

cc: Jake Jennings
Chris Libertelli

CompTel

August 1999

CC DOCKET No. 96-98

Competitive Telecommunications Association



ACCESS LINES BY MSA
MSA: New York

SORTED by BUSINESS

County	Zip Code	CLLI	Total	Business	Residential	Sp Access	Public	Business Single Line	CUMULATIVE % of TOTAL
NEW YORK	10022	NYCMNY56	230,084	142,022	46,395	35,292	6,375	5,184	6.66%
NEW YORK	10011	NYCMNY18	178,549	89,313	63,034	22,194	4,009	5,694	10.85%
NEW YORK	10007	NYCMNY37	128,074	88,844	13,165	22,077	3,988	2,867	15.02%
NEW YORK	10019	NYCMNY50	147,862	85,127	37,760	21,154	3,821	3,521	19.02%
NEW YORK	10036	NYCMNY42	106,265	80,786	1,779	20,075	3,626	4,754	22.81%
NEW YORK	10018	NYCMNY36	110,568	78,232	9,385	19,440	3,511	4,391	26.43%
NEW YORK	10017	NYCMNYWS	123,256	73,949	27,612	18,376	3,319	2,575	29.95%
NEW YORK	10016	NYCMNY30	133,596	71,373	41,284	17,736	3,203	4,235	33.30%
NEW YORK	10003	NYCMNY13	195,696	67,394	108,530	16,747	3,025	5,188	36.45%
QUEENS	11101	NYCQNYLI	135,581	60,773	56,979	15,102	2,728	2,666	39.31%
NEW YORK	10004	NYCMNYBS	73,546	55,382	1,916	13,762	2,486	988	41.91%
KINGS	11201	NYCKNYBR	124,910	51,454	58,361	12,786	2,309	3,146	44.33%
NEW YORK	10021	NYCMNY79	159,335	47,496	97,904	11,803	2,132	4,308	46.56%
BRONX	10461	NYCXNYTR	214,500	45,168	156,081	11,224	2,027	3,938	48.57%
WESTCHESTER	10601	WHPLNYWP	91,300	39,846	39,764	9,902	1,788	2,710	50.54%
NEW YORK	10013	NYCMNYVS	70,735	39,715	19,368	9,869	1,783	3,595	52.41%
QUEENS	11373	NYCQNYNW	170,917	35,834	124,569	8,905	1,608	4,003	54.09%
QUEENS	11354	NYCQNYFL	126,660	35,390	80,887	8,794	1,588	3,250	55.75%
NEW YORK	10029	NYCMNY97	127,777	33,721	84,162	8,380	1,514	2,504	57.33%
NEW YORK	10023	NYCMNY73	119,363	25,936	85,817	6,445	1,164	2,702	58.55%
RICHMOND	10301	NYCRNYS	90,111	24,179	58,839	6,008	1,085	2,227	59.68%
WESTCHESTER	10701	YNKRNYYN	85,572	23,424	55,276	5,821	1,051	1,986	60.78%
BRONX	10457	NYCXNYCR	117,662	23,396	87,402	5,814	1,050	2,240	61.88%
QUEENS	11103	NYCQNYAS	99,050	22,679	69,717	5,836	1,018	2,269	62.94%
KINGS	11219	NYCKNYFT	89,873	22,445	60,843	5,578	1,007	2,616	64.00%
KINGS	11209	NYCKNY77	91,300	22,216	62,566	5,521	997	2,541	65.04%
NEW YORK	10010	NYCKNYWM	64,588	22,069	36,044	5,484	991	1,960	66.06%
QUEENS	11374	NYCQNYFH	98,210	21,985	69,775	5,463	987	2,267	67.11%
KINGS	11212	NYCKNYRA	92,601	21,974	64,180	5,460	986	1,661	68.14%
QUEENS	11361	NYCQNYBA	96,173	21,255	68,683	5,282	954	2,133	69.14%
QUEENS	11365	NYCQNYJA	71,666	20,659	44,946	5,134	927	1,873	70.11%
WESTCHESTER	10801	NWRCNYNR	61,497	20,081	35,525	4,990	901	1,922	71.05%
BRONX	10455	NYCXNYMH	54,446	18,523	30,488	4,603	831	1,115	71.92%
QUEENS	11413	NYCQNYLN	80,042	17,557	57,334	4,363	788	1,597	72.74%
KINGS	11230	NYCKNYKP	79,576	17,401	57,070	4,324	781	2,035	73.55%
NEW YORK	10048	NYCMNST	22,380	17,301	3	4,299	777	198	74.37%
WESTCHESTER	10550	MTVRNYMV	62,604	17,207	40,349	4,276	772	1,722	75.18%
NEW YORK	10025	NYCMNYMN	99,030	17,005	77,036	4,226	763	1,694	75.97%
KINGS	11213	NYCKNYTY	90,809	16,971	68,859	4,217	762	1,655	76.77%
KINGS	11215	NYCKNY14	49,777	15,722	29,442	3,907	706	1,404	77.51%
WESTCHESTER	10573	PTCHNYPC	40,564	15,183	20,927	3,773	681	1,287	78.22%
BRONX	10458	NYCXNYTB	84,575	15,039	65,123	3,737	675	1,464	78.53%
KINGS	11238	NYCKNYCL	69,495	14,899	50,225	3,702	669	1,514	79.63%
KINGS	11223	NYCKNYAR	72,340	14,460	53,638	3,593	649	1,924	80.30%
KINGS	11204	NYCKNY71	65,576	13,678	47,885	3,399	614	1,702	80.95%
NEW YORK	10040	NYCMNYWA	62,166	12,800	45,611	3,181	575	1,104	81.55%
KINGS	11226	NYCKNYAL	82,478	12,671	66,090	3,149	569	1,688	82.14%
KINGS	11235	NYCKNYAY	68,639	12,496	52,478	3,105	561	1,549	82.73%
KINGS	11223	NYCKNYAU	66,804	12,222	50,995	3,037	549	1,235	83.30%
WESTCHESTER	10603	GNBGNYFV	19,662	12,211	3,868	3,034	548	521	83.87%
QUEENS	11420	NYCQNYOP	73,651	12,109	57,990	3,009	543	1,646	84.44%
KINGS	11234	NYCKNYAI	59,550	12,051	43,963	2,995	541	1,191	85.01%
WESTCHESTER	10707	TKHONYTU	45,173	11,718	30,017	2,912	526	1,164	85.55%
ROCKLAND	10965	PRRVNYNP	30,354	11,557	15,406	2,872	519	975	86.10%
QUEENS	11423	NYCQNYHS	65,751	11,252	51,199	2,796	505	1,304	86.63%
QUEENS	11691	NYCQNYFR	40,970	11,230	26,446	2,791	504	969	87.16%
NEW YORK	10031	NYCMNYCA	71,811	11,068	57,495	2,750	497	1,068	87.67%
BRONX	10463	NYCXNYKB	57,003	10,872	42,942	2,702	488	1,050	88.18%
RICHMOND	10306	NYCRNYND	44,188	10,868	30,132	2,701	488	1,058	88.59%
QUEENS	11418	NYCQNYRH	52,335	10,781	38,391	2,679	484	1,223	89.20%
RICHMOND	10314	NYCRNYWS	48,436	10,449	34,920	2,597	469	942	89.69%
WESTCHESTER	10543	MMRNNYMA	27,508	10,119	14,420	2,515	454	993	90.17%
RICHMOND	10312	NYCRNYSS	59,912	9,833	47,195	2,443	441	1,456	90.63%
WESTCHESTER	10591	TRTWNYTT	21,325	9,715	8,759	2,414	436	570	91.08%
WESTCHESTER	10549	MTKSNYMK	20,989	8,997	9,352	2,236	404	902	91.51%
WESTCHESTER	10583	SCDLNYSR	29,450	8,817	18,046	2,191	396	1,001	91.92%
ROCKLAND	10977	SPVYNYSV	33,847	8,621	22,696	2,142	387	1,065	92.32%
QUEENS	11368	NYCQNYCO	38,542	8,580	27,445	2,132	385	546	92.73%

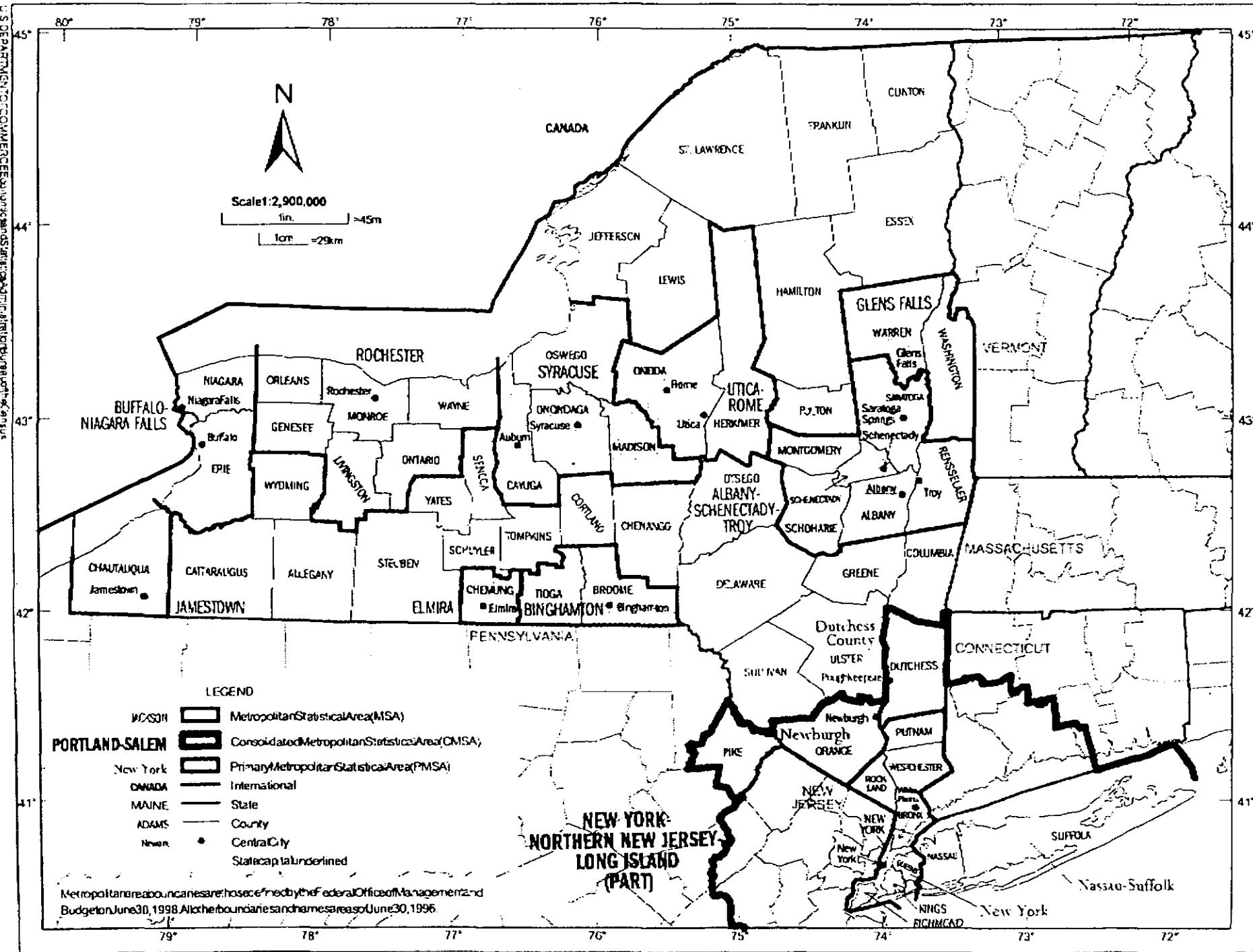


ACCESS LINES BY MSA
MSA: New York

SORTED by BUSINESS

County	Zip Code	CLLI	Total	Business	Residential	Sp Access	Public	Business Single Line	CUMULATIVE % of TOTAL
BRONX	10452	NYCXNYJE	47,274	8,413	36,393	2,091	378	721	93.12%
KINGS	11208	NYCKNYLA	48,379	7,820	38,265	1,943	351	821	93.49%
BRONX	10453	NYCXNYGC	40,837	7,761	30,799	1,929	348	744	93.85%
QUEENS	11365	NYCQNYNJ	30,715	7,712	20,741	1,916	346	513	94.21%
KINGS	11221	NYCKNYBU	51,509	7,488	41,825	1,861	336	819	94.57%
WESTCHESTER	10566	PKSKNYP	31,110	7,479	21,437	1,859	336	814	94.92%
WESTCHESTER	10522	DBFYNYDF	25,479	7,341	15,985	1,824	329	851	95.26%
WESTCHESTER	10528	HRSNNYHN	10,252	7,298	813	1,814	328	206	95.56%
ROCKLAND	10956	NWCNYNYC	20,978	7,190	11,679	1,787	323	817	95.94%
WESTCHESTER	10562	OSNGNYOS	25,905	7,012	16,835	1,743	315	849	96.27%
ROCKLAND	10960	NYACNYNK	18,797	6,876	9,903	1,709	309	742	96.59%
WESTCHESTER	10570	PSVLNYPV	18,370	6,553	9,895	1,628	294	695	96.90%
ROCKLAND	10901	SFRNNYSU	17,963	5,968	10,245	1,483	268	579	97.18%
WESTCHESTER	10598	YRTWNYTT	24,205	5,731	18,792	1,424	257	582	97.45%
NEW YORK	10040	NYCMNYTH	32,360	5,499	25,248	1,367	247	514	97.71%
ROCKLAND	10962	ORBGNYOB	15,152	5,003	8,682	1,243	225	461	97.94%
QUEENS	11693	NYCQNYBH	29,421	4,979	22,981	1,237	223	444	98.17%
ROCKLAND	10993	WHVRNYWH	20,879	4,292	15,328	1,067	193	558	98.38%
WESTCHESTER	10538	LRMTNYLA	13,295	3,888	8,266	966	174	523	98.56%
ROCKLAND	10970	POMNNYPO	14,284	3,377	9,917	839	152	455	98.72%
WESTCHESTER	10580	RYEENYRY	11,511	3,327	7,208	827	149	329	98.87%
WESTCHESTER	10504	ARVGNYAV	6,336	2,710	2,830	673	122	265	99.00%
ROCKLAND	10920	CNGRNYCN	9,863	2,661	6,421	661	119	306	99.13%
WESTCHESTER	10536	KTNHNYKA	9,400	2,165	6,600	538	97	278	99.23%
WESTCHESTER	10578	PRDYNYPD	8,393	2,015	5,787	501	90	72	99.32%
WESTCHESTER	10514	CHPQNYCP	6,483	1,882	4,048	468	84	236	99.41%
PUTNAM	10512	CRMLNYCL	11,523	1,655	9,383	411	74	184	99.49%
PUTNAM	10541	MHPCNYMP	11,699	1,573	9,664	391	71	284	99.56%
PUTNAM	10579	PTVYNYPY	10,385	1,566	8,360	389	70	294	99.63%
WESTCHESTER	10520	CRHDNYCH	7,559	1,546	5,558	384	69	256	99.71%
WESTCHESTER	10506	BDVGNYBV	6,282	1,228	4,694	305	55	191	99.76%
BRONX	10464	NYCXNYCI	3,701	1,177	2,179	292	53	116	99.82%
PUTNAM	10509	BRWSNYBW	10,004	998	8,713	248	45	160	99.87%
WESTCHESTER	10590	SSLMNYSS	5,092	856	3,985	213	38	153	99.91%
PUTNAM	10516	CSPPNYCS	3,567	819	2,508	203	37	148	99.95%
NEW YORK	10006	NYCMNYZO	2,589	357	2,128	89	16	45	99.98%
ROCKLAND	10974	SLTSNYSL	1,751	356	1,291	88	46	58	99.98%
QUEENS	11430	NYCQNYIA	433	335	-	83	15	19	99.99%
PUTNAM	12563	PASNYYPN	2,697	65	2,613	16	3	9	100.00%
BRONX	10459	NYCXNYHO	94	38	44	10	2	-	100.00%
PUTNAM	10524	GRSNNYGA	1,536	10	1,523	2	0	5	100.00%
NEW YORK			6,486,700	2,131,121	3,730,347	529,579	95,653	158,561	

NEW YORK - Metropolitan Areas, Counties, and Central Cities





ACCESS LINES BY MSA
Chicago

SORTED by BUSINESS

County	Zip Code	CLLI	Total	Business	Residential	Sp Access	Public	Business Single Line	CUMULATIVE % of TOTAL
COOK	60606	CHCGILFR	198,022	123,051	3,608	68,359	3,003	5,511	6.18%
COOK	60007	EGVGILEG	122,691	59,765	28,266	33,201	1,459	3,182	9.18%
COOK	60610	CHCGILSU	140,662	59,408	46,801	33,003	1,450	4,496	12.16%
COOK	60005	ARLHILAH	133,113	48,710	56,153	27,060	1,189	3,797	14.61%
COOK	60657	CHCGILLW	180,145	43,140	111,987	23,966	1,053	5,951	16.78%
COOK	60607	CHCGILMO	95,251	43,066	27,208	23,925	1,051	3,235	18.94%
DU PAGE	60515	DWGVILDG	116,274	38,237	55,851	21,242	933	3,809	20.86%
COOK	60016	DSPLILXL	120,848	37,274	40,826	41,530	1,219	2,413	22.73%
COOK	60609	CHCGILLA	98,566	37,230	39,745	20,683	909	2,590	24.60%
COOK	60090	WLNGILWG	94,477	35,950	37,679	19,971	877	2,742	26.40%
COOK	60647	CHCGILHB	124,287	35,510	68,184	19,727	867	4,992	28.19%
COOK	60606	CHCGILCL	57,850	34,938	2,651	19,409	853	1,042	29.94%
DU PAGE	60148	LBRDILLM	89,630	34,500	35,121	19,166	842	2,762	31.67%
COOK	60104	BLWDILBW	91,536	34,066	37,715	18,925	831	2,628	33.38%
COOK	60077	SKOKILSK	79,985	33,055	27,760	18,363	807	2,413	35.04%
COOK	60610	CHCGILID	55,910	32,149	5,117	17,860	785	1,830	36.66%
COOK	60641	CHCGILKI	112,058	30,501	63,867	16,945	744	4,259	38.19%
DU PAGE	60126	EMHRILET	77,546	28,715	32,179	15,952	701	2,926	39.63%
DU PAGE	60172	RSLLILRZ	91,361	27,829	47,393	15,460	679	3,310	41.03%
LAKE	60048	LBVLILLI	78,050	27,174	35,116	15,096	663	2,916	42.39%
DU PAGE	60521	HNDLILHI	72,880	26,444	31,100	14,691	645	2,392	43.72%
DU PAGE	60540	NPVILINA	99,339	26,356	57,898	14,642	643	3,523	45.05%
DU PAGE	60187	WHTNILWH	88,534	26,120	47,267	14,511	638	2,753	46.36%
KANE	60120	ELGNILEL	86,469	26,026	45,349	14,458	635	3,106	47.66%
COOK	60062	NBRKILNB	58,755	25,912	17,815	14,395	632	2,375	48.97%
LAKE	60085	WKGNILWK	86,779	25,463	46,549	14,145	621	2,714	50.24%
COOK	60631	CHCGILNE	79,810	25,308	39,825	14,059	618	2,341	51.51%
COOK	60640	CHCGILED	104,959	25,106	65,294	13,947	613	3,816	52.78%
KANE	60134	GENVILGN	69,367	24,256	31,044	13,475	592	2,799	53.99%
COOK	60601	CHCGILLR	42,242	24,230	3,961	13,460	591	455	55.21%
COOK	60406	BLISILBI	75,851	22,869	39,720	12,704	558	2,221	56.36%
COOK	60068	PRRGILXL	70,122	22,128	22,615	24,655	723	1,532	57.47%
COOK	60171	RVGVILRG	71,266	20,973	38,129	11,652	512	2,095	58.52%
COOK	60618	CHCGILIR	75,458	20,547	43,995	11,415	502	2,987	59.55%
COOK	60195	HFESILWL	59,132	19,904	27,684	11,058	486	1,527	60.55%
COOK	60525	LGRCILLG	66,227	19,851	34,864	11,028	485	2,294	61.55%
COOK	60501	SMMTILSM	56,625	19,595	25,666	10,886	478	1,061	62.53%
COOK	60457	OKLWIOL	74,658	19,591	43,705	10,884	478	2,258	63.52%
COOK	60173	SCBGILCO	32,218	18,813	2,495	10,451	459	750	64.46%
COOK	60629	CHCGILPM	68,692	17,779	40,802	9,877	434	1,746	65.36%
KANE	60506	AURRILAR	60,879	17,411	33,370	9,673	425	1,983	66.23%
COOK	60637	CHCGILDO	70,521	17,258	43,254	9,588	421	1,872	67.10%
COOK	60626	CHCGILRP	86,547	16,645	60,249	9,247	406	3,277	67.93%
COOK	60426	HRVYILHA	49,059	16,147	23,548	8,970	394	1,642	68.74%
COOK	60636	CHCGILPR	76,874	16,109	51,422	8,949	393	2,304	69.55%
COOK	60067	PALTILPA	60,664	15,743	35,791	8,746	384	2,405	70.34%
COOK	60162	HLSDLILHD	35,819	15,534	11,276	8,630	379	906	71.12%
COOK	60176	SCP KILSP	31,983	15,463	7,553	8,590	377	729	71.90%
COOK	60053	MRGVILMG	43,834	15,284	19,686	8,491	373	1,182	72.67%
COOK	60517	CHCGILSC	72,565	15,181	48,580	8,434	371	2,284	73.43%
COOK	60620	CHCGILST	82,212	15,048	58,437	8,380	367	2,952	74.18%
COOK	60409	CMCYILCC	58,238	14,832	34,803	8,240	362	1,849	74.93%
LAKE	60015	DRFDILDF	36,391	14,817	12,982	8,231	362	1,371	75.67%
WILL	60431	JOLTILJO	47,310	13,361	26,200	7,423	326	1,642	76.34%
COOK	60639	CHCGILME	50,494	13,283	29,508	7,379	324	1,799	77.01%
COOK	60477	TNP KILTP	53,625	13,104	32,921	7,280	320	1,636	77.67%
DU PAGE	60521	OKBRILOA	21,203	12,667	1,190	7,037	309	460	78.31%
KANE	60505	AURRILAE	46,086	12,548	26,260	6,971	306	1,239	78.94%
WILL	60435	JOLTILJW	40,369	12,288	20,955	6,826	300	1,379	79.55%
COOK	60462	ORPKILOR	45,065	12,258	25,699	6,810	299	1,553	80.17%
COOK	60457	HCHLILHH	44,054	12,231	24,730	6,795	299	1,521	80.78%
COOK	60103	BRTLILBT	64,542	12,192	45,280	6,773	298	1,986	81.39%
COOK	60616	CHCGILCA	37,569	12,190	18,309	6,772	298	981	82.01%
MCHENRY	60014	CRLKILCK	38,843	11,685	20,382	6,491	285	1,825	82.59%
COOK	60643	CHCGILBE	58,864	11,111	41,310	6,172	271	2,150	83.15%
DU PAGE	60185	GLVVILGV	33,786	10,998	16,410	6,110	268	1,300	83.70%
COOK	60192	HFESILPC	16,887	10,662	43	5,923	260	34	84.24%
COOK	60624	CHCGILKE	31,983	10,529	15,348	5,849	257	1,012	84.77%



ACCESS LINES BY MSA
Chicago

SORTED by BUSINESS

County	Zip Code	CLLI	Total	Business	Residential	Sp Access	Public	Business Single Line	CUMULATIVE % of TOTAL
COOK	60466	PKFSILPF	40,236	10,488	23,665	5,827	256	1,025	85.29%
COOK	60430	HMWDILHO	41,733	10,257	25,528	5,698	250	1,571	85.81%
COOK	60644	CHCGILAU	42,142	10,001	26,341	5,556	244	1,555	86.31%
COOK	60411	CHHGILCH	29,328	9,037	15,049	5,021	221	940	86.77%
COOK	60623	CHCGILLD	34,876	9,017	20,630	5,009	220	1,191	87.22%
LAKE	60010	BNTOILBA	26,755	8,967	12,587	4,982	219	1,493	87.67%
LAKE	60045	LKFRILLF	25,530	8,938	11,408	4,966	218	1,132	88.12%
DU PAGE	60137	GLELIGLE	30,449	8,894	16,398	4,941	217	1,258	88.56%
COOK	60628	CHCGILPU	48,222	8,746	34,404	4,859	213	1,376	89.00%
KANE	60118	EDNDILDU	28,465	8,600	14,878	4,777	210	1,227	89.43%
COOK	60653	CHCGILOK	42,180	8,422	28,874	4,679	206	1,118	89.86%
MCHENRY	60050	MCHNILMY	31,066	8,390	17,810	4,661	205	1,510	90.28%
COOK	60093	WNTKILWN	24,928	8,379	11,689	4,655	205	1,251	90.70%
DU PAGE	60143	ITSCILAB	16,680	7,917	4,171	4,398	193	308	91.10%
DU PAGE	60540	NPVLILNE	12,748	7,793	434	4,330	190	281	91.49%
COOK	60464	PLPKILPP	24,460	7,584	12,477	4,213	185	1,086	91.87%
LAKE	60035	HGPKILHP	22,971	7,370	11,327	4,094	180	1,206	92.24%
LAKE	60047	LKZRILLZ	23,503	6,929	12,556	3,849	169	1,129	92.59%
WILL	60423	FRFTILFB	22,213	6,736	11,571	3,742	164	901	92.93%
DU PAGE	60185	WCHCILWC	22,698	6,620	12,238	3,678	162	720	93.26%
MCHENRY	60098	WDSTILWS	18,889	5,940	9,505	3,300	145	920	93.56%
DE KALB	60115	DKLBILXA	22,102	5,840	14,288	1,812	162	348	93.85%
DU PAGE	60439	LEMТИILLE	17,090	5,695	8,092	3,164	139	570	94.14%
COOK	60411	ECHGILEH	19,556	5,660	10,613	3,144	138	552	94.42%
LAKE	60064	NCHCILNC	16,038	5,407	7,494	3,004	132	255	94.69%
COOK	60091	WLMTILWI	21,232	5,209	13,002	2,894	127	1,033	94.95%
WILL	60544	PLFDILPL	19,403	5,150	11,266	2,861	126	863	95.21%
LAKE	60084	WCNDILWU	17,622	5,130	9,516	2,850	125	859	95.47%
DU PAGE	60439	LEMТИLLN	28,181	5,112	20,104	2,840	125	723	95.73%
LAKE	60099	ZIONILZN	19,306	4,549	12,118	2,527	111	695	95.95%
LAKE	60002	ANTCILAC	15,258	4,302	8,461	2,390	105	844	96.17%
MCHENRY	60013	CARYILCA	18,730	4,259	12,001	2,366	104	840	96.38%
COOK	60173	SCBGILRS	13,845	4,255	7,123	2,364	104	346	96.60%
GRUNDY	60450	MRRSILMS	13,095	3,614	7,385	2,008	88	593	96.78%
MCHENRY	60102	ALGNILAQ	20,295	3,611	14,591	2,006	88	772	96.96%
WILL	60440	BGBKILBK	16,871	3,356	11,569	1,864	82	487	97.13%
LAKE	60030	GYLKILGL	13,494	3,327	8,238	1,848	81	594	97.30%
LAKE	60073	RNLKILRL	17,848	3,192	12,805	1,773	78	615	97.46%
WILL	60451	NWLNLNL	14,337	3,135	9,383	1,742	77	673	97.61%
WILL	60441	LCPTILLP	13,210	2,943	8,559	1,635	72	539	97.76%
DE KALB	60178	SYCMILXA	10,022	2,793	6,286	867	77	189	97.90%
WILL	60448	MOKNILME	12,671	2,716	8,379	1,509	66	464	98.04%
LAKE	60046	LKVILLK	15,024	2,581	10,979	1,422	62	591	98.17%
MCHENRY	60033	HRVRILAI	7,817	2,150	4,421	1,194	52	431	98.27%
MCHENRY	60152	MRNGILMR	6,774	1,878	3,807	1,043	46	392	98.37%
LAKE	60020	FXLKILFK	10,771	1,751	8,004	973	43	419	98.46%
WILL	60449	MONEILGK	6,609	1,729	3,877	961	42	219	98.54%
KENDALL	60543	OSWGILOS	8,014	1,645	5,414	914	40	386	98.63%
GRUNDY	60447	MINKILMK	7,879	1,619	5,321	899	40	221	98.71%
KENDALL	60580	YRVLILYO	6,449	1,496	4,086	831	37	256	98.78%
DU PAGE	60555	WNVLILWV	7,116	1,490	4,762	828	36	254	98.86%
WILL	60417	CRETILCM	8,512	1,431	6,251	795	35	401	98.93%
MCHENRY	60142	HNTLILHO	4,830	1,417	2,592	787	35	176	99.00%
DE KALB	60548	SNDWLIXA	4,694	1,415	2,801	439	39	349	99.07%
WILL	60481	WLMGILWM	6,457	1,379	4,279	766	34	260	99.14%
COOK	60633	CHCGILMH	6,618	1,345	4,492	747	33	156	99.21%
KENDALL	60545	PLANILPO	4,606	1,087	2,889	604	27	215	99.26%
WILL	60441	RMVLILRM	6,784	992	5,216	551	24	170	99.31%
KANE	60119	ELBNILEU	3,867	987	2,308	548	24	192	99.36%
MCHENRY	60081	SPGVILXA	3,220	919	1,991	285	25	242	99.41%
COOK	60611	CHCGILOH	1,437	906	5	503	22	31	99.45%
GRUNDY	60416	CLCYILCG	4,640	875	3,257	486	21	188	99.50%
DE KALB	60135	GENOILXA	3,347	777	2,307	241	22	53	99.54%
KANE	60140	HMPsilhs	3,074	777	1,846	432	19	134	99.58%
KANE	60554	SGGVILSV	3,007	688	1,919	382	17	140	99.61%
MCHENRY	60071	RCMDILXA	1,776	679	867	211	19	160	99.64%
MCHENRY	60097	WNLKILXA	4,315	630	3,472	195	17	290	99.68%
MCHENRY	60180	UNINILUN	1,843	607	885	337	15	75	99.71%

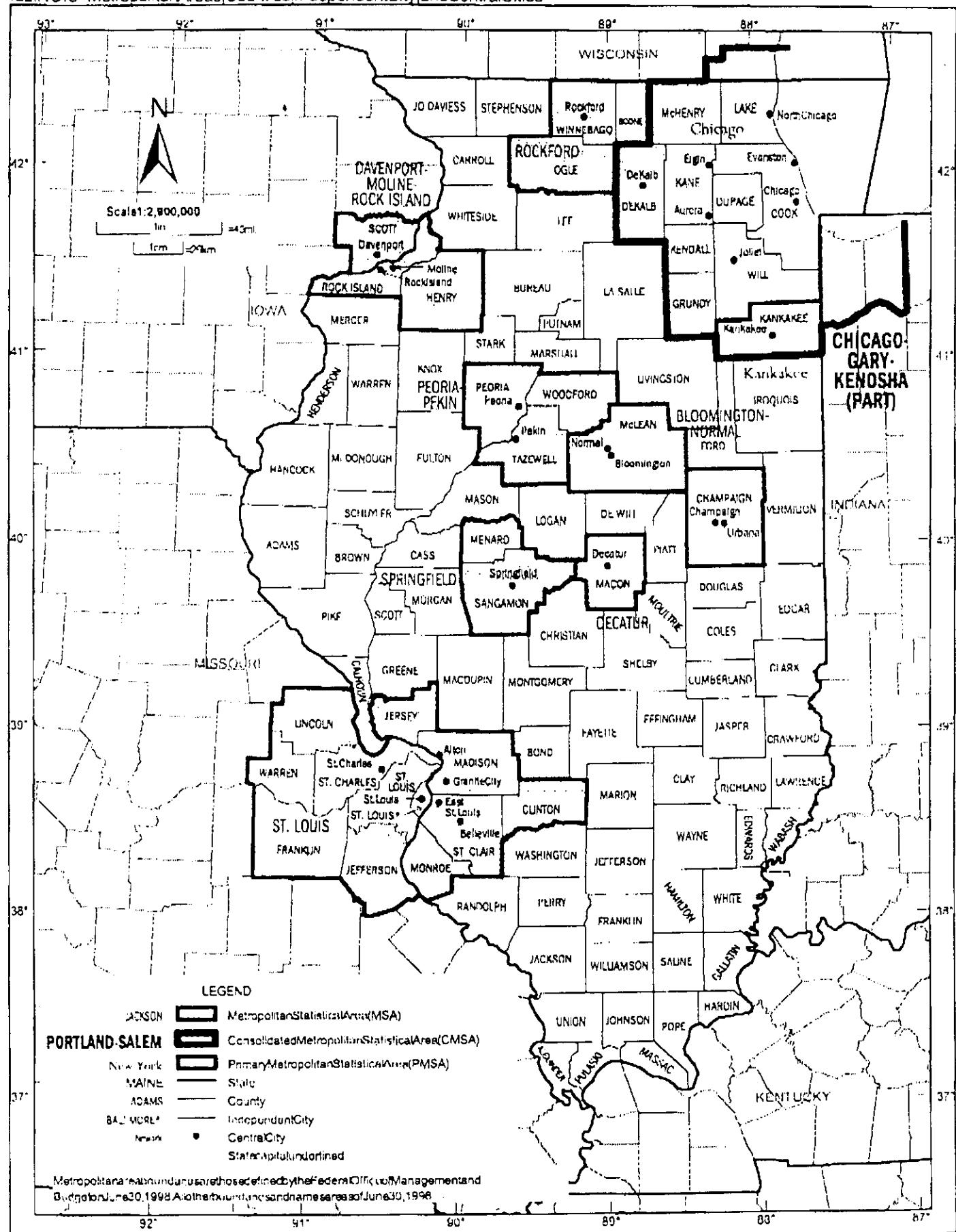


ACCESS LINES BY MSA
Chicago

SORTED by BUSINESS

<u>County</u>	<u>Zip Code</u>	<u>CLLI</u>	<u>Total</u>	<u>Business</u>	<u>Residential</u>	<u>Sp Access</u>	<u>Public</u>	<u>Business Single Line</u>	<u>CUMULATIVE % of TOTAL</u>
WILL	60408	BRWDILBR	3,508	575	2,599	320	14	109	99.74%
WILL	60442	MNHTILMA	3,212	538	2,362	299	13	145	99.76%
COOK	60062	NBRKILNT	822	520	-	289	13	0	99.79%
WILL	60468	PETNILPT	3,070	503	2,276	279	12	98	99.81%
LAKE	60010	BNTOILAG	815	474	66	264	12	14	99.84%
WILL	60401	BCHRILBC	2,186	409	1,539	227	10	82	99.86%
KANE	60170	PLCTILPR	2,356	379	1,757	211	9	118	99.88%
WILL	60421	ELWDILEW	1,408	332	884	184	8	33	99.89%
MCHENRY	60034	HBRNILXA	1,439	314	1,019	97	9	123	99.91%
KANE	60568	AGSTILXC	774	310	395	51	18	23	99.93%
DE KALB	60520	HNCKILXA	1,484	282	1,106	88	8	32	99.94%
DE KALB	60552	SMNKILXA	2,670	231	2,361	72	6	102	99.95%
DE KALB	60150	MALTILXA	735	180	494	56	5	13	99.96%
DE KALB	60146	KRLDILXA	926	118	770	36	3	13	99.97%
KANE	60144	KAVLILKA	1,128	115	947	64	3	36	99.97%
KENDALL	60541	NWRKILNW	1,152	112	976	62	3	36	99.98%
DE KALB	60550	SHBNILXA	918	91	796	28	3	16	99.98%
KANE	60151	MAPKILXA	629	87	512	27	2	5	99.99%
DE KALB	60556	WTMNILXA	661	57	585	18	2	10	99.99%
GRUNDY	60424	GRNRILGD	1,955	55	1,868	30	1	10	99.99%
GRUNDY	60444	MAZNILMZ	635	37	578	20	1	6	99.99%
KANE	60511	BGRKILBG	459	33	407	18	1	17	100.00%
KENDALL	60560	PTVLILPV	390	29	344	16	1	14	100.00%
GRUNDY	60437	KNMNLXKA	95	26	64	4	1	2	100.00%
KENDALL	60541	LSBNILLB	281	25	241	14	1	9	100.00%
GRUNDY	60479	VRNAILVE	268	5	259	3	0	2	100.00%
			6,148,647	1,991,462	2,972,178	1,135,850	49,157	200,341	

ILLINOIS—MetropolitanAreas, Counties, IndependentCity, and CentralCities





ACCESS LINES BY MSA
Atlanta

SORTED by BUSINESS

County	City	CLLI	Total	Business	Residential	Sp Access	Public	Business Single Line	CUMULATIVE % of TOTAL
DEKALB	ATLANTA	ATLNGACS	105,293	53,931	21,285	28,456	1,621	1,785	6.28%
DEKALB	ATLANTA	ATLNGAPP	98,241	43,013	31,239	22,695	1,293	1,701	11.29%
GWINNETT	NORCROSS	NRCRGAMA	102,120	41,684	37,189	21,994	1,253	1,865	16.14%
COBB	MARIETTA	MRTTGAEA	15,271	41,072	8,058	459	1,619		20.92%
COBB	MARIETTA	MRTTGAMA	129,857	40,255	67,152	21,240	1,210	2,801	25.61%
DEKALB	ATLANTA	ATLNGBU	88,677	36,993	31,053	19,519	1,112	1,967	29.92%
DEKALB	TUCKER	TUKRGAMA	83,148	33,488	30,984	17,669	1,007	1,621	33.82%
DEKALB	ATLANTA	ATLNGATH	80,000	27,847	36,623	14,693	837	1,351	37.06%
DEKALB	ATLANTA	ATLNGASS	65,113	27,449	22,357	14,483	825	1,477	40.26%
FULTON	ROSWELL	RSWLGAMA	90,341	25,946	49,925	13,690	780	2,080	43.28%
COBB	SMYRNA	SMYRGAMA	85,801	24,529	47,593	12,942	737	1,483	46.13%
COBB	SMYRNA	SMYRGAPF	59,283	24,497	21,124	12,925	736	992	48.99%
FULTON	ALPHARETTA	ALPRGAMA	71,174	23,542	34,503	12,422	708	1,532	51.73%
GWINNETT	LILBURN	LLBNGAMA	81,950	21,908	47,824	11,560	659	1,608	54.28%
DEKALB	ATLANTA	ATLNGAEP	67,136	21,865	33,077	11,537	657	1,213	56.83%
GWINNETT	LAWRENCEVILLE	LRVLGAMS	77,028	19,648	46,422	10,367	591	1,638	59.11%
HALL	GAINESVILLE	GSVLGAMA	57,517	16,864	31,247	8,898	507	1,212	61.08%
COBB	MARIETTA	MRTTGAEA	64,860	15,271	41,072	8,058	459	1,619	62.86%
GWINNETT	DULUTH	DLTHGAHS	43,930	14,856	20,790	7,838	447	1,054	64.58%
DEKALB	ATLANTA	ATLNGAWD	38,011	14,261	15,797	7,524	429	769	66.25%
DEKALB	CLARKSTON	ATLNGAIC	54,306	14,063	32,400	7,420	423	1,165	67.88%
DEKALB	ATLANTA	ATLNGAAD	33,041	12,967	12,842	6,842	390	407	69.39%
CHEROKEE	WOODSTOCK	WDSTGACR	60,038	12,266	40,931	6,472	369	1,595	70.82%
ROCKDALE	CONYERS	CNYRGAMA	46,072	12,137	27,166	6,404	365	1,047	72.23%
CLAYTON	FOREST PARK	ATLNQAPP	32,991	11,168	15,594	5,893	336	683	73.53%
CLAYTON	RIVERDALE	RVDLGAMA	39,582	10,403	23,378	5,489	313	843	74.75%
DEKALB	ATLANTA	ATLNGAEL	39,436	9,822	24,137	5,182	295	774	75.89%
COWETA	NEWNAN	NWNNGAMA	39,943	9,459	25,209	4,991	284	914	76.99%
CARROLL	CARROLLTON	CRTNGAMA	32,197	9,271	17,756	4,892	279	850	78.07%
BARTOW	CARTERSVILLE	CRVLGAMA	32,033	9,190	17,717	4,849	276	804	79.14%
GWINNETT	SNELLVILLE	SNLVGAMA	45,512	8,936	31,593	4,715	269	1,155	80.18%
DOUGLAS	DOUGLASVILLE	DGVLGAMA	42,640	8,716	29,064	4,599	262	1,064	81.20%
FORSYTH	CUMMING	CMNGGAMA	38,125	8,699	24,575	4,590	261	1,016	82.21%
CLAYTON	JONESBORO	JNBOGAMA	49,551	8,691	36,013	4,586	261	891	83.22%
DEKALB	ATLANTA	ATLNQABH	26,364	7,857	14,125	4,146	236	529	84.14%
DEKALB	ATLANTA	ATLNGACD	35,013	7,379	23,518	3,894	222	948	85.00%
SPALDING	GRIFFIN	GRFNGAMA	34,611	7,351	23,161	3,879	221	713	85.85%
DEKALB	STONE MOUNT	SNMTGALR	32,381	6,959	21,541	3,672	209	744	86.66%
FAYETTE	PEACHTREE CI	PTCYGAMA	25,103	6,671	14,711	3,520	201	504	87.44%
COBB	AUSTELL	ASTLGAMA	40,078	6,640	29,736	3,503	200	704	88.21%
FAYETTE	FAYETTEVILLE	FYVLGASG	25,684	6,319	15,841	3,334	190	769	88.95%
GWINNETT	BUFORD	BUFRGABH	28,374	6,182	18,744	3,262	186	688	89.67%
NEWTON	COVINGTON	CVTNQAMT	30,668	6,083	21,192	3,210	183	714	90.38%
DEKALB	ATLANTA	ATLNQAGR	28,580	5,929	19,345	3,128	178	533	91.07%
DEKALB	ATLANTA	ATLNQAWE	28,845	5,590	20,138	2,949	168	630	91.72%
DEKALB	ATLANTA	ATLNQALA	24,389	5,569	15,714	2,938	167	409	92.37%
FULTON	FAIRBURN	FRBNQGAEB	23,207	5,236	15,051	2,763	157	377	92.97%
CLAYTON	MORROW	MRRWGAMA	19,910	4,916	12,253	2,594	148	325	93.55%
HENRY	MCDONOUGH	MCDNGAGS	23,104	4,606	15,929	2,430	138	496	94.08%
HENRY	STOCKBRIDGE	STBRGANH	23,370	4,538	18,300	2,395	136	608	94.61%
CHEROKEE	CANTON	CNTNGAXA	13,918	3,886	7,987	1,928	117	345	95.06%
DEKALB	LITHONIA	LTHNGAJS	14,767	3,886	8,714	2,050	117	406	95.52%
COBB	ACWORTH	ACWOGAMA	21,602	3,708	15,826	1,957	111	514	95.95%
WALTON	MONROE	MONRGAXA	15,572	3,509	10,217	1,741	105	322	96.36%
BARROW	WINDER	WNDRGAXA	10,951	2,956	6,439	1,466	89	240	96.70%
PAULDING	DALLAS	DLSGAES	20,712	2,951	16,114	1,557	89	445	97.05%
COBB	POWDER SPRIN	PWSPGAA	19,974	2,905	15,449	1,533	87	359	97.38%
POLK	CEDARTOWN	CDTWGAMA	12,029	2,355	8,361	1,242	71	286	97.66%
CHEROKEE	CANTON	CNTNGAXB	9,584	2,155	6,295	1,069	65	255	97.91%
CARROLL	VILLA RICA	VLRCGAE	9,143	1,928	6,140	1,017	58	215	98.13%
BUTTS	JACKSON	JCSNGAMA	7,548	1,591	5,070	839	48	139	98.32%
HALL	FLOWERY BRAN	FLBRGAMA	7,261	1,462	4,983	772	44	117	98.49%
LAMAR	BARNESVILLE	BRVIGAMA	6,625	1,321	4,568	697	40	115	98.64%
HARALSON	BREMEN	BRMNGAES	6,091	1,300	4,067	686	39	131	98.79%
GWINNETT	LOGANVILLE	LGVLGAC	8,264	1,253	6,313	661	38	192	98.94%
POLK	ROCKMART	RCKMGAES	6,977	1,136	5,208	599	34	130	99.07%
PICKENS	JASPER	JSPRGAXA	4,662	919	3,260	456	28	96	99.18%
HENRY	HAMPTON	HMPNGAJW	5,033	907	3,620	479	27	84	99.28%

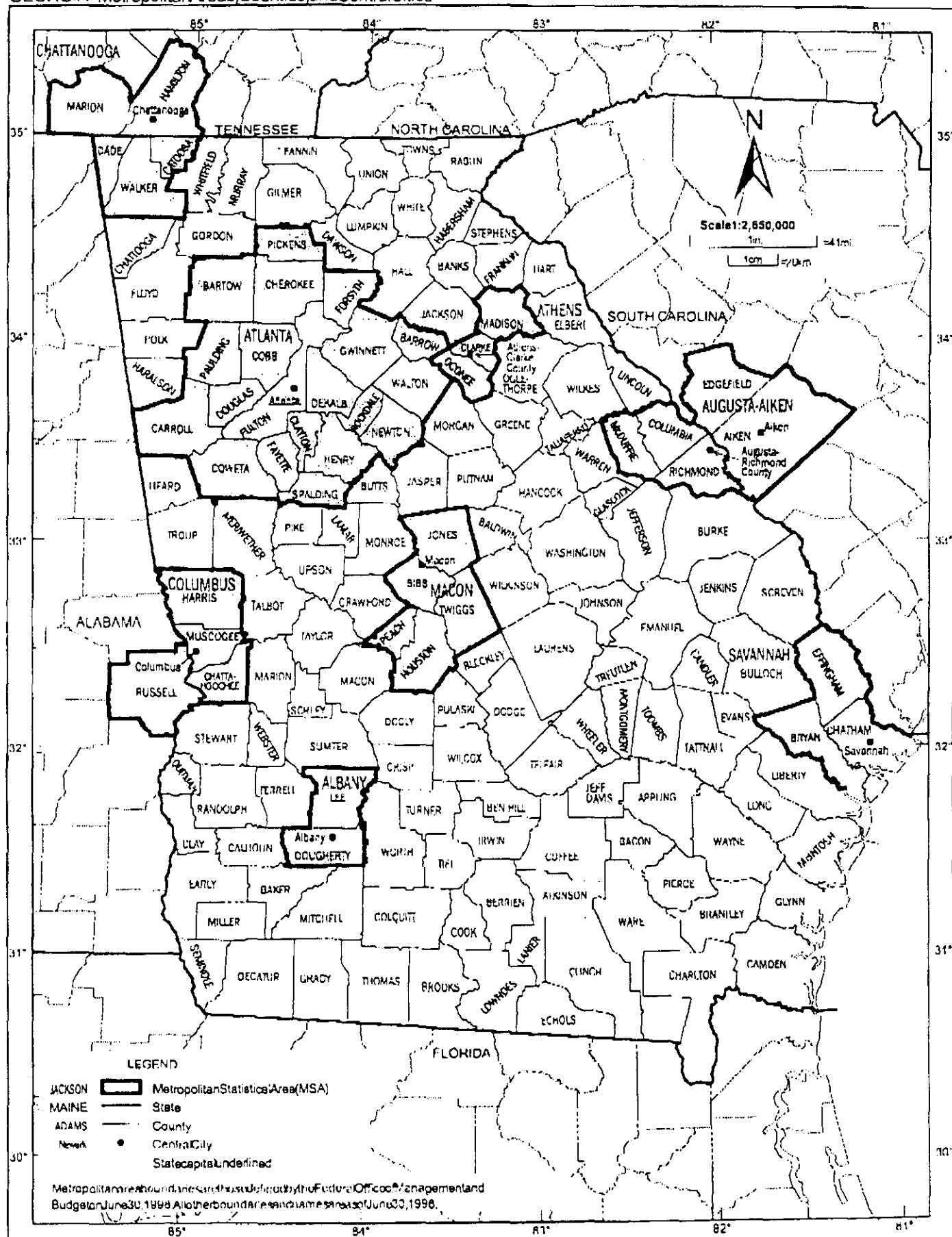


ACCESS LINES BY MSA
Atlanta

SORTED by BUSINESS

<u>County</u>	<u>City</u>	<u>CLLI</u>	<u>Total</u>	<u>Business</u>	<u>Residential</u>	<u>Sp Access</u>	<u>Public</u>	<u>Business Single Line</u>	<u>CUMULATIVE % of TOTAL</u>
FULTON	PALMETTO	PLMTGAMA	4,341	839	3,035	443	25	89	99.38%
HARALSON	TALLAPOOSA	TLLPGAES	4,156	817	2,884	431	25	69	99.48%
BARTOW	ADAIRSVILLE	AVLGAMA	3,071	616	2,112	325	19	80	99.55%
WALTON	SOCIAL CIRCLE	SCCRGAMA	2,865	610	1,915	322	18	61	99.62%
COWETA	SENOIA	SENOGAMA	3,340	542	2,496	286	16	81	99.68%
CHEROKEE	NELSON	NLSNGAXA	3,433	430	2,915	70	18	38	99.73%
CARROLL	ROOPVILLE	RPVLGAMA	3,811	428	3,145	226	13	78	99.78%
HEARD	FRANKLIN	FKLNGAMA	2,714	358	2,156	189	11	34	99.82%
HALL	CLERMONT	CLMTGAMA	3,522	356	2,967	188	11	74	99.87%
CARROLL	TEMPLE	TMPLGAMA	3,258	265	2,845	140	8	58	99.90%
PICKENS	MARBLE HILL	MRHLGAXA	1,901	241	1,610	39	10	10	99.93%
HALL	LULA	LULAGAMA	2,293	206	1,972	109	6	28	99.95%
COWETA	GRANTVILLE	GTVLGAMA	1,278	160	1,028	84	5	25	99.97%
HARALSON	BUCHANAN	BCHNGAES	2,515	153	2,277	81	5	31	99.99%
BARTOW	KINGSTON	KGTNGAMA	1,025	125	831	66	4	15	100.00%
ATLANTA			2,784,135	858,803	1,503,806	431,254	26,208	57,812	

GEORGIA-MetropolitanAreas, Counties, and Central Cities



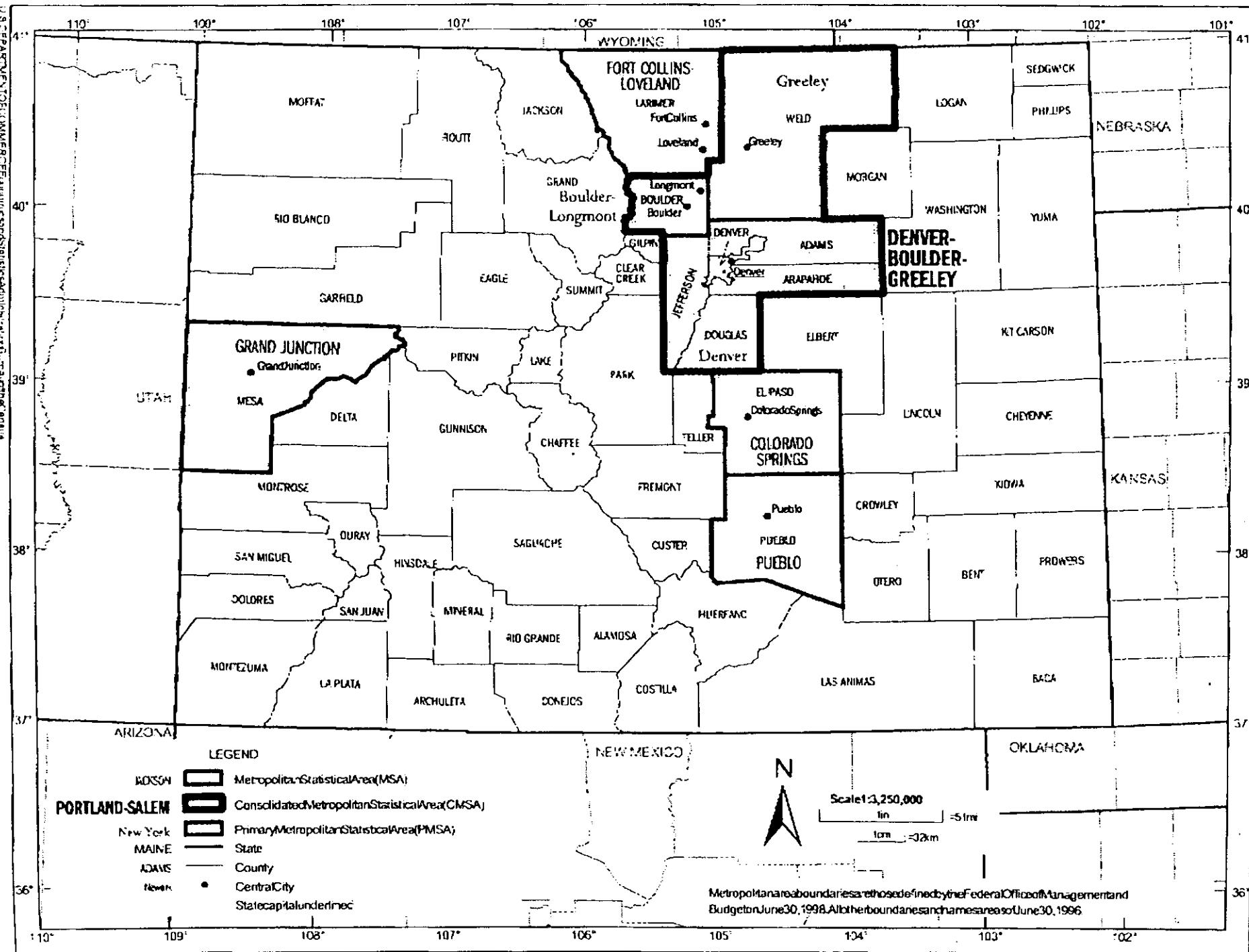


ACCESS LINES BY MSA
Denver

SORTED by BUSINESS

<u>County</u>	<u>Zip Code</u>	<u>CLLI</u>	<u>Total</u>	<u>Business</u>	<u>Residential</u>	<u>No Access</u>	<u>Public</u>	<u>Business Single Line</u>	<u>CUMULATIVE % of TOTAL</u>
DENVER	80205	DNVRCOCP	95,302	42,063	9,795	42,523	922	1,004	9.31%
ARAPAHOE	80111	DNVRCODC	122,425	41,399	38,267	41,852	907	2,001	18.47%
DENVER	80220	DNVRCOEA	125,440	34,736	54,827	35,116	761	2,125	26.15%
DENVER	80202	DNVRCOMA	74,334	30,085	13,176	30,414	659	1,349	32.81%
DENVER	80218	DNVRCOCH	65,338	24,307	15,925	24,573	533	1,018	38.18%
ARAPAHOE	80014	DNVRCOSL	114,023	22,709	67,859	22,957	498	1,707	43.21%
DENVER	80222	DNVRCOSE	72,177	19,290	32,963	19,502	423	1,402	47.48%
DENVER	80209	DNVRCOSO	71,592	19,051	32,863	19,260	418	1,298	51.69%
JEFFERSON	80002	ARVDCOMA	100,846	19,036	61,948	19,245	417	1,888	55.90%
JEFFERSON	80215	LKWDCOMA	62,862	15,425	31,506	15,594	338	1,200	59.32%
ARAPAHOE	80010	AURRCOMA	81,556	14,661	51,752	14,822	321	1,125	62.56%
DENVER	80227	DNVR COSW	71,125	14,024	42,615	14,178	307	1,170	65.66%
ADAMS	80030	WMNSCOMA	69,834	14,008	41,358	14,161	307	1,105	68.76%
ARAPAHOE	80112	ENWD COAB	31,818	13,851	3,661	14,003	304	401	71.83%
ARAPAHOE	80120	LTTN COMA	60,887	12,688	35,094	12,827	278	1,231	74.63%
ADAMS	80229	DNVR CONE	44,303	12,303	19,294	12,437	270	652	77.36%
ARAPAHOE	80110	ENWD COMA	46,357	11,994	21,974	12,126	263	1,023	80.01%
DENVER	80239	DNVR COMB	34,394	11,132	11,763	11,254	244	278	82.47%
ADAMS	80221	NGLN COMA	54,248	10,851	32,189	10,970	238	721	84.87%
DENVER	80211	DNVR CONO	48,585	10,796	26,638	10,914	237	775	87.26%
DENVER	80219	DNVR COWS	57,397	10,703	35,639	10,820	235	888	89.63%
JEFFERSON	80123	DNVR COCL	58,900	9,193	40,212	9,294	201	978	91.66%
JEFFERSON	80401	GLDN COMA	34,046	8,791	16,176	8,887	193	549	93.61%
ARAPAHOE	80015	DNVR COSH	50,843	5,892	38,865	5,956	129	701	94.91%
DOUGLAS	80134	PRKRCOMA	21,121	4,251	12,479	4,298	93	512	95.85%
ADAMS	80601	BITN COMA	16,656	3,802	8,927	3,844	83	297	96.69%
DOUGLAS	80104	CSR KCONM	19,224	3,560	11,988	3,598	78	425	97.48%
JEFFERSON	80439	EVRG COMA	18,763	3,533	11,582	3,571	77	495	98.26%
DOUGLAS	80126	LTTN COHE	17,547	2,575	12,311	2,504	56	245	98.83%
JEFFERSON	80215	LKWD COTC	5,712	2,416	801	2,442	53	79	99.37%
JEFFERSON	80401	LKMT COMA	6,467	1,559	3,297	1,577	34	170	99.71%
JEFFERSON	80465	MRSNCOMA	6,803	690	5,400	698	15	122	99.87%
DENVER	80223	DNVR COHX	1,032	266	491	269	6	18	99.92%
DOUGLAS	80118	LRKS CONM	1,278	198	875	200	4	33	99.97%
ADAMS	80022	DNVR COOU	279	133	9	134	3	4	100.00%
ARAPAHOE	80015	AURR COMB	37	10	17	10	0	-	100.00%
			1,763,351	451,980	844,537	456,929	9,906	28,988	

COLORADO-Metropolitan Areas, Counties, and Central Cities





ACCESS LINES BY MSA
San Antonio

SORTED by BUSINESS

<u>County</u>	<u>Zip Code</u>	<u>CLLI</u>	<u>Total</u>	<u>Business</u>	<u>Residential</u>	<u>Sp Access</u>	<u>Public</u>	<u>Business Single Line</u>	<u>CUMULATIVE % of TOTAL</u>
BEXAR	78225	SNANTXCA	85,287	37,413	23,859	22,795	1,221	1,202	14.60%
BEXAR	78225	SNANTXDI	89,744	30,798	39,176	18,764	1,005	1,333	26.61%
BEXAR	78233	SNANTXFR	93,074	20,028	60,191	12,202	653	1,395	34.43%
BEXAR	78209	SNANTXTA	63,363	19,150	31,921	11,668	625	1,015	41.90%
BEXAR	78238	SNANTXCU	83,420	17,985	53,891	10,958	587	1,001	48.91%
BEXAR	78227	SNANTXLA	58,868	17,602	29,966	10,725	574	418	55.78%
BEXAR	78201	SNANTXPE	57,030	15,067	32,292	9,180	492	975	61.66%
BEXAR	78216	SNANTXWE	52,956	11,503	34,070	7,008	375	747	66.15%
BEXAR	78221	SNANTXWA	49,716	10,565	32,369	6,437	345	839	70.27%
BEXAR	78240	SNANTXBA	46,069	9,745	30,068	5,938	318	468	74.07%
COMAL	78130	NBRNTXNB	31,671	7,728	18,983	4,708	252	812	77.09%
BEXAR	78216	SNANTXGE	45,833	7,685	33,214	4,683	251	724	80.09%
BEXAR	78229	SNANTXMC	18,519	7,378	6,406	4,495	241	185	82.96%
BEXAR	78219	SNANTXMA	25,723	6,605	14,878	4,024	215	295	85.54%
BEXAR	78222	SNANTXED	31,046	6,588	20,229	4,014	215	397	88.11%
BEXAR	78210	SNANTXLE	33,254	6,525	22,540	3,976	213	480	90.66%
BEXAR	78148	SNANTXUC	28,646	4,999	20,437	3,046	163	386	92.61%
GUADALUPE	78155	SGINTXSG	20,315	4,733	12,543	2,884	154	351	94.45%
BEXAR	78231	SNANTXSL	23,356	3,793	17,128	2,311	124	297	95.93%
BEXAR	78255	SNANTXLS	6,298	1,927	3,133	1,174	63	90	96.89%
WILSON	78114	FLVLTXXA	7,218	1,911	4,542	733	31	156	97.43%
COMAL	78163	BLVRTXXA	6,289	1,248	4,756	203	81	81	97.92%
BEXAR	78223	SNANTXSO	4,280	737	3,070	449	24	86	98.21%
BEXAR	78211	SNANTXIC	6,078	667	4,983	406	22	72	98.47%
BEXAR	78023	SNANTXHE	3,148	646	2,088	393	21	77	98.72%
COMAL	78130	CRMLTXXA	5,751	609	5,004	99	40	60	98.96%
BEXAR	78221	SNANTXTH	3,300	474	2,522	289	15	57	99.14%
BEXAR	78212	SNANTXPA	2,365	444	1,636	271	14	44	99.31%
COMAL	78130	STLRTXXA	1,809	383	1,339	62	25	28	99.46%
BEXAR	78223	SNANTXSA	2,042	336	1,491	205	11	60	99.59%
COMAL	78130	SMVYTXXA	2,517	305	2,142	50	20	28	99.71%
BEXAR	78002	SNANTXJA	2,121	223	1,756	136	7	32	99.80%
BEXAR	78069	SMRTXXA	863	121	694	46	2	19	99.85%
GUADALUPE	78123	SGINTXMQ	1,580	88	1,436	54	3	15	99.88%
COMAL	78130	SABNTXXA	1,104	87	998	14	6	5	99.91%
GUADALUPE	78638	KGBRTXXA	791	61	716	10	4	9	99.94%
COMAL	78130	KNBGTXXA	953	51	891	8	3	4	99.96%
COMAL	78130	HNCCTXXA	1,319	47	1,262	8	3	5	99.98%
GUADALUPE	78124	MARNTXMR	1,620	35	1,562	22	1	5	99.99%
WILSON	78161	STSPTXXA	950	13	931	5	0	6	100.00%
WILSON	78121	LVRNTXXA	1,314	11	1,299	4	0	3	100.00%
COMAL	78130	RKCKTXXA	422	-	422	-	-	-	100.00%
WILSON	78147	KSCSTXXA	382	-	382	-	-	-	100.00%
WILSON	78147	POTHETXXA	1,001	-	1,001	-	-	-	100.00%
SAN ANTONIO			1,003,407	256,314	584,218	154,456	8,420	14,063	

TEXAS-Metropolitan Areas, Counties and Central Cities

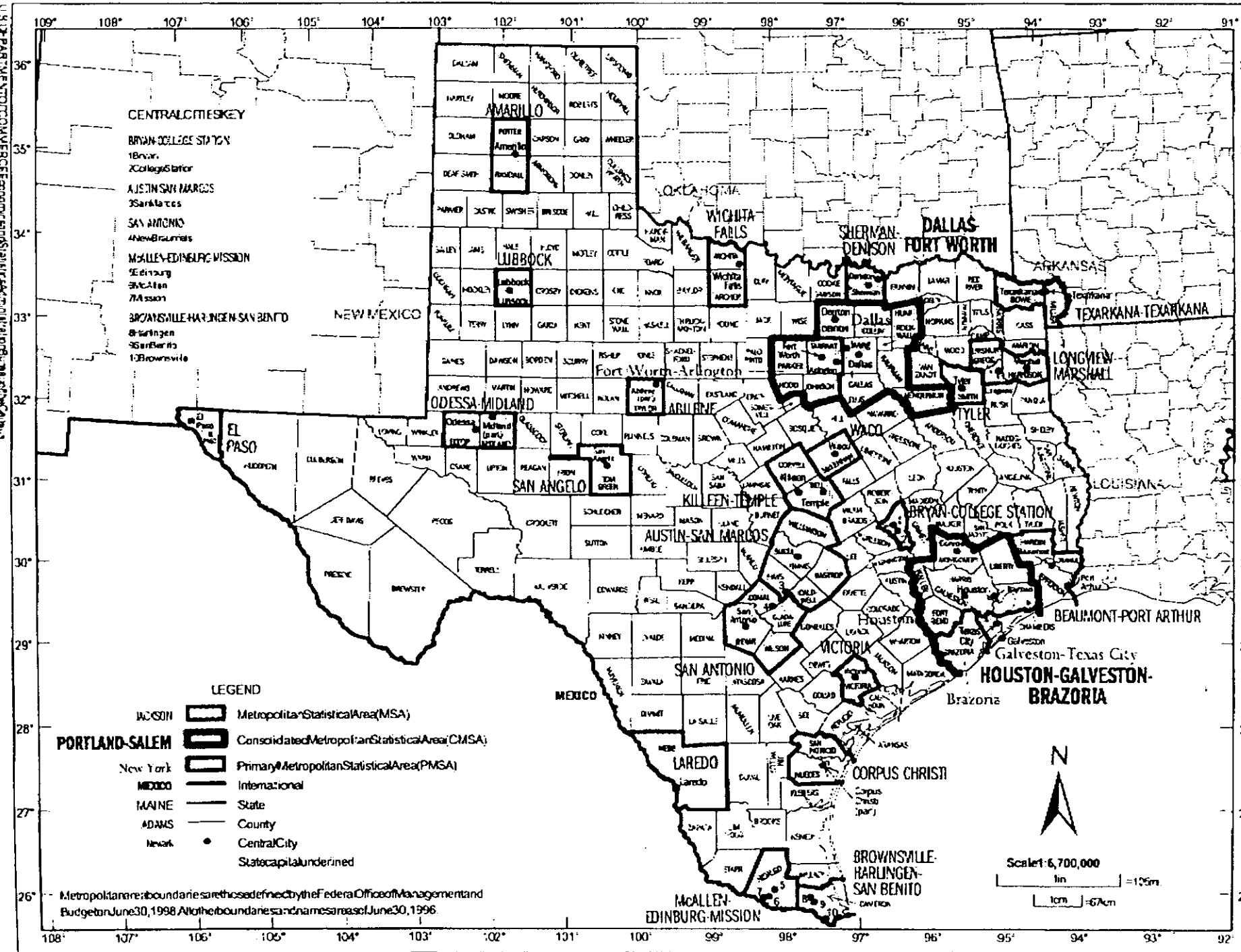


EXHIBIT 3

Exhibit 3**AGGREGATE CLEC MARKET SHARE
(LISTED BY MSA)**

The table below estimates the *maximum* CLEC share in the top 6 MSAs (those with estimated business lines of over 1 million) by assuming that 100% of the UNE loops sold by the serving RBOC in the identified state(s) are sold in the that specific MSA. For instance, in computing the maximum CLEC share in the Washington, DC MSA, the table assumes that *every* UNE loop sold by Bell Atlantic in the District of Columbia, Maryland and Virginia (the three states partially touched by the Washington, DC MSA) are actually provided within the MSA itself.

	States	Business Lines in MSA	UNE Loops in State(s)	CLEC Share
New York	New York	2,154,596	49,442	2.2%
LA	California	2,149,360	46,561	2.1%
Chicago	Illinois	2,068,118	20,469	1.0%
DC	DC,MD,VA	1,657,658	3,391	0.2%
Boston	Massachusetts	1,355,657	3,098	0.2%
Philadelphia	Pennsylvania	1,093,074	29,771	2.7%

CERTIFICATE OF SERVICE

I, Patricia A. Bell, hereby certify that true and correct copies of the foregoing were served via courier this 19th day of August, 1999 to each individual on the attached service list.



A handwritten signature in black ink, appearing to read "Patricia Bell". Below the signature, the name "Patricia A. Bell" is printed in a smaller, standard font.

Service List in CC Docket 96-98

Lawrence E. Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Jake E. Jennings
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Robert Atkinson
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ms. Dorothy Attwood
Office of Commissioner Kennard
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ms. Linda Kinney
Office of Commissioner Ness
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. William Bailey
Office of Commissioner Furchtgott-Roth
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mr. Kyle Dixon
Office of Commissioner Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Ms. Sarah Whitesell
Office of Commissioner Tristani
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554